MOD 000766998

ATTACHMENT A [to 4/26/91 letter to MDNR]

HAZARDOUS WASTE DIRECTOR'S QUALIFICATIONS: (HAROLD HUGGINS)

A. 2-15-90 QUINCY ILLINOUS
   ILLINOIS ENVIRONMENTAL REGULATORY UPDATE WORKSHOP
   QUINCY AREA SAFETY COUNCIL
   8 HOURS
B. 5-24-90 JEFFERSON CITY, MISSOURI
   MISSOURI HAZARDOUS WASTE CONFERENCE
   ASSOCIATED INDUSTRIES OF MISSOURI
   8 HOURS
C. 4-25-91 QUINCY ILLINOIS
   CERTIFICATE OF TRAINING
   MR. CLIFF METCALF (ENVIRONMENTAL CONSULTANT)
   8 HOURS

THIS CERTIFIES

THAT

HAROLD HUGGINS

HAS COMPLETED 8 HOURS OF REFRESHER TRAINING FOR HAZARDOUS WASTE ACTIVITIES UNDER REGULATIONS PURSUANT TO 40 CFR 265.16.

SPECIFIC TRAINING INCLUDED

1. REGULATORY OVERVIEW/UPDATE
2. HAZARDOUS WASTE PROCEDURES
3. WASTE STREAM REVIEW
4. CONTINGENCY PLAN REVIEW

DATE OF CERTIFICATION:
APRIL 25, 1991

INSTRUCTOR: C. L. Metcalf

HAZ WASTE HANDLING TRAINING

SESSION #1 Wed. Feb.14
3:15 p.m.
W.Q. Lunchroom

Mike Dill
Bill Greving
John Bartz
Eddie Maples

Ed Van Sickle
Trudy Wheeler
Mervin Lay
Steve Savage
Buck Friday
Leo Duniven
Roger Fast
Butch Earel
Ron Gilbert
Ray Alexander
Steve Root
Bill Shear
Dave Kline
Dale Stewart
Bob Dowell

SESSION #2 Thurs. Feb 15
3:15 p.m.
W.Q. Lunchroom

Dan Asbury
Ron Hubble
Gary Mohr
Ron Rathbun

Norman Wright
Carlie Crandall
Harold Hays
Harm Kaufman
Richard Fenton
David Burbridge
Michael Ray
Scott Wingerter
Mike Shoopman
Lynn Sly
John Barger
Daryl Bartz
Butch O'Brien
Steve Potter
John Sly
Mike Dillon
Don Powers
John Whitaker
David Whittaker

SESSION #3

Jon Wren

John Van Order
George Johnson
Todd Platt
Rusty Kaylor
Rick Miller
Kelly Naderhoff
Andy Sullivan
Dan Wiskirchen
George Ellsworth

SESSION #4

John Wente
Dale Corrigan

Doug Carper
Tim Nutt
Curtis Moore
Les Garrett
Tom Kitch
Mike McCallister
Jerry Barnes
Sam Smith

SESSION #5 Thurs. Feb 15 7:00 a.m. W.Q. Lunchroom

Mike Houston
Bruce Orr

Tom Pitford
Randy Sly
Lonnie Shipe
Clinton Kirchner
Terry Ensminger
John Moyers

John Smith
Mike Boling
Dennis Totsch
Ron Lewis
Todd Dolbeare

BC/wp\pltraini

TRAINING REQUIREMENTS
KNAPHEIDE MANUFACTURING CO.
QUINCY, IL AND WEST QUINCY, MO

All Knapheide personnel involved with the handling, generation, or storage of hazardous waste will be included in an employee training program as required by 40 CFR 265.16. Employee's initial training will consist of a two-hour classroom session, following the attached outline. Initial training will be conducted at a minimum of once every six months to ensure all employees are trained within their first six months. In addition to this two hour training, employees will also receive an additional two hours of OSHA Hazard Communication Training.

The training sessions will be conducted by an individual experienced and trained in Hazardous Materials handling such as a Certified Industrial Hygienist (CIH), Certified Safety Professional (CSP), Certified Hazardous Materials Manager (CHMM), etc.

An annual review, consisting of a two hour session, will be held for all employees who have already completed the initial training. The annual review will cover the same topics as the initial training, but in an abbreviated format.

Other employees who do not routinely work with hazardous materials but who may enter manufacturing or hazardous material storage areas (i.e. office workers) will receive only the two hour Hazard Communication training.

HAZARD COMMUNICATION
TRAINING OUTLINE

I. Introduction to the OSHA Hazard Communication Program

A. The Intent of the Hazard Communication Standard

B. Primary Components of the Standard

1. The Written Program (including location)
2. Chemical Inventory
3. Material Safety Data Sheets (MSDS)
4. Chemical Labeling
5. Employee Training

II. Chemical Hazard Concepts

A. General Toxicological Principals

1. Routes of Exposure

a. inhalation
b. ingestion
c. skin contact

2. Duration of Exposure

a. acute
b. chronic

3. The Concept of Dose vs. Concentration

a. LD_{50}
b. permissible exposure limits
c. short-term exposure limits
d. IDLH atmospheres

4. Carcinogenicity

B. General Physical Hazards of Chemicals

1. The Concept of Flammability/Combustibility

a. flashpoints
b. lower and upper explosive limits
c. autoignition temperature

2. Corrosive Properties of Hazardous Materials

a. acids
b. caustics

3. Reactive Properties of Hazardous Materials

a. oxidizers
b. pyrophorics

C. Recognition of Potential Chemical Exposure (Methods and Observations)

III. Specific Chemicals At Knapheide

A. Locations of Chemicals

B. Location of Chemical Inventory

IV. Material Safety Data Sheets (MSDS)

A. The Importance of MSDS

B. MSDS Format

1. General Information
2. Hazardous Components
3. Physical Data
4. Fire and Explosion Hazard Data
5. Health Hazard Data
6. Reactivity Data
7. Environmental Protection Information
8. Special Protection Information
9. Special Precautions

C. Location of the MSDS Notebook

D. Availability of MSDS

V. The HMIS Labeling System

VI. Protective Equipment and Engineering Controls

- A. Gloves
- B. Eye Protection
- C. Aprons or Coveralls
- D. Respiratory Protection
- E. Chemical Storage Cabinets
- F. Spill Control Equipment
- G. Fire Extinguishers
- H. Ventilation Hoods
- I. Eye Wash/Safety Shower

VII. Visiting Contractor Procedures

VIII. Procedures for Knapheide Personnel Working Off-Site

Hazard Communication Training
Acknowledgement Form

I, _____ acknowledge that the Knapheide Manufacturing Company has provided to me hazard communication training regarding the hazardous chemicals to which I may be exposed. Specifically, this training included the following:

1. An overview of the written Hazard Communication Program;
2. An explanation of Material Safety Data Sheets;
3. A general overview of chemical toxicology and the physical and chemical properties of hazardous materials;
4. Information on personal protective equipment and other means of protection from chemical exposure;
5. An explanation of the HMIS labeling system;
6. An overview of the specific chemicals to which I may be exposed at Knapheide.

I acknowledge that this information has been clearly taught to me and I understand all aspects of the material.

_____
Employee Signature

_____
Department

_____
Date

I have instructed the above-named employee in the fundamentals of the Knapheide Manufacturing Company Hazard Communication Program.

_____
Instructor

_____
Date

HAZARDOUS WASTE MANAGEMENT
TRAINING OUTLINE

I. Hazardous Waste Handling and Disposal

A. Personnel Responsibilities

1. Manifesting
2. Inspection
3. Inventory

B. Waste Streams

C. Accumulation and Inventory Procedures

D. Labeling of Containers

E. Removal of Containers

F. Storage Facilities

1. Segregated by Waste
2. Aisle Space
3. Emergency Communication Access

G. Waste Disposal

H. Empty Container Handling and Storage

II. Emergency Contingency Plan

A. Emergency Arrangements

B. Personnel Responsibilities

C. Emergency Equipment (Use, Inspection, Repair, Replacement and Monitoring)

1. Communication
2. Fire Extinguishers
3. Absorbent Materials
4. Sprinkler System
5. Security and Alarm
6. Inspection Services

D. Evacuation Plan

E. Emergency Action Plans (Emergency Procedures, Immediate Response, Shutdown of Operations, Reporting)

1. Fire/Explosion
2. Spill/Unplanned Release
3. Tornado
4. Power Outages
5. Snow Storm
6. Flood

Hazardous Waste Management Training
Acknowledgement Form

I, _____, acknowledge that Knapheide Manufacturing Company has provided to me Hazardous Waste Management Training regarding Hazardous Waste which I may be required to handle. In addition to other RCRA procedures, this training included the following emergency response topics:

1. Procedures for using, inspecting, repairing, and replacing facility emergency and monitoring equipment;

2. Communications or alarm systems;

3. Responses to fires and explosions;

4. Response to groundwater contamination incidents;

5. Shutdown of operations.

I understand that this information has been clearly taught to me and I understand all aspects of the material.

_____
Signature

_____
Department

_____
Date

I have instructed the above-named employee in the fundamentals of the Knapheide Manufacturing Company Hazardous Waste Management Program.

_____
Instructor

_____
Date